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12 Attorneys for Defendant

13  
14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**  
16

17 JACQUELYN MARZAN,

18 Plaintiff,

19 v.

20 KILOLO KIJAKAZI,  
21 Acting Commissioner of Social Security,  
22 Defendant.

)  
) Case No.: 2:21-cv-01647-DJA  
)

) **STIPULATION TO VOLUNTARY**  
) **REMAND PURSUANT TO SENTENCE**  
) **FOUR OF 42 U.S.C. § 405(g) AND TO**  
) **ENTRY OF JUDGMENT FOR**  
) **PLAINTIFF**  
)  
)  
)  
)

23 IT IS HEREBY STIPULATED by and between the parties, through their undersigned  
24 attorneys, and with the approval of the Court, that this action be remanded for further administrative  
25 action pursuant to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g), sentence four.

26 On remand, the Appeals Council will remand the case to a new administrative law judge (ALJ)  
for a new decision. Upon remand, the Appeals Council will direct the ALJ to further evaluate  
Plaintiff's residual functional capacity; further evaluate the opinion evidence; if warranted, obtain  
vocational expert testimony to assist in determining whether there are jobs that exist in significant

1 numbers in the national economy that Plaintiff can perform with her residual functional capacity,  
2 resolving any conflicts between the expert's testimony and the Dictionary of Occupational Titles; take  
3 any action necessary to complete the administrative record; offer Plaintiff an opportunity for a hearing;  
4 and issue a new decision.

5 The parties further request that the Clerk of the Court be directed to enter a final judgment in  
6 favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

7  
8 Dated: April 29, 2022

Respectfully submitted,

9 RICHARD HARRIS LAW FIRM

10 /s/ Richard A. Harris

11 RICHARD A. HARRIS

(\*as authorized via email on April 29, 2022)

12 Attorney for Plaintiff

13 Dated: April 29, 2022

Respectfully submitted,

14 CHRISTOPHER CHIOU

15 Acting United States Attorney

16 /s/ Allison J. Cheung

17 ALLISON J. CHEUNG

Special Assistant United States Attorney

18 Attorneys for Defendant

19  
20 IT IS SO ORDERED:

21   
22 HON. DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

23 DATED: May 3, 2022

**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Richard A. Harris  
[rick@richardharrislaw.com](mailto:rick@richardharrislaw.com)  
Attorney for Plaintiff

Joshua R. Harris  
[josh@richardharrislaw.com](mailto:josh@richardharrislaw.com)  
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 29, 2022

*/s/ Allison J. Cheung*  
ALLISON J. CHEUNG  
Special Assistant United States Attorney